

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO  
and KARL LEIBINGER, on behalf of themselves  
and those similarly situated  
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK  
BELGIUM (formerly known  
as ARTESIA BANKING CORP S.A.)  
Defendants

No. 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware  
Corporation, STONINGTON CAPITAL  
APPRECIATION 1994 FUND L.P., a Delaware  
Partnership and STONINGTON HOLDINGS, L.L.C., a  
Delaware limited liability company,  
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING CORP., SA),  
Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE PERLMAN,  
Trustees of the TRA Rights Trust,  
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING CORP., SA),  
Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBAKER LLC  
and JMBAKER LLC,  
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING CORP., SA),  
Defendants.

No.: 04-CV-10501 (PBS)

**JOINT STATUS REPORT OF PARTIES REGARDING MOTION TO  
COMPEL DOCUMENTS THAT DEXIA CLAIMED AS PRIVILEGED**

Pursuant to this Honorable Court's Order dated October 5, 2006, the parties have in good faith conferred about the documents in Plaintiffs' October 4, 2006 narrowed set of objections to

Dexia's privilege log entries, and the parties have agreed to a resolution regarding those documents.

Accordingly, Plaintiffs and Defendants submit to the Court that they have together in good faith resolved the arguments and issues in Plaintiffs' June 16, 2006 Motion to Compel (*Quaak v. Dexia, S.A.*, No. 03-CV-11566-PBS, Docket No. 284; *Stonington Partners, Inc. v. Dexia, S.A.*, No. 04-CV-10411-PBS, Docket No. 109; *Baker v. Dexia, S.A.*, No. 04-CV-10501-PBS, Docket No. 113; *Filler v. Dexia, S.A.*, No. 04-CV-10477-PBS, Docket No. 133) and there is no need for a ruling or additional Court action on this particular motion.

Respectfully submitted,

BERMAN DEVALERIO PEASE  
TABACCO BURT & PUCILLO

/s/ Patrick T. Egan

Glen DeValerio, BBO # 122010  
Jeffrey C. Block, BBO # 600747  
Patrick T. Egan, BBO # 637477  
([pegan@bernabesq.com](mailto:pegan@bernabesq.com))  
Allison K. Jones, BBO # 654804  
One Liberty Square  
Boston, MA 02109  
Telephone: (617) 542-8300

SHALOV STONE & BONNER LLP

Lee S. Shalov  
James P. Bonner  
Patrick L. Rocco  
485 Seventh Avenue, Suite 10000  
New York, New York 10018  
Telephone: (212) 239-4340

CAULEY BOWMAN CARNEY & WILLIAMS LLC

Allen Carney  
11001 Executive Center Drive, Suite 200  
P.O. Box 25438  
Little Rock, Arkansas 72212  
Telephone: (501) 312-8500

**CO-LEAD COUNSEL TO LEAD CLASS**

**PLAINTIFFS HANS A. QAAK, ATTILIO PO and KARL LEIBINGER**

CLIFFORD CHANCE US LLP

/s/ Jeff E. Butler

Jeff E. Butler, Esquire  
Kara Morrow, Esquire  
31 West 52<sup>nd</sup> Street  
New York, NY 10019

**COUNSEL TO DEFENDANTS**

BERNSTEIN LITOWITZ BERGER &  
GROSSMAN LLP

/s/ Stephen Foytlin

Steven B. Singer

Avi Josefson

Stephen Foytlin

1285 Avenue of the Americas

New York, NY 10019

Telephone: (212) 554-1400

LOONEY & GROSSMAN LLP

Richard J. Grahn, BBO # 206620

(rgrahn@lgllp.com)

Charles P. Kindregan, BBO # 554947

101 Arch Street

Boston, MA 02110

Telephone: (617) 951-2800

**COUNSEL TO PLAINTIFFS STONINGTON PARTNERS, INC., STONINGTON  
CAPITAL APPRECIATION 1994 FUND L.P. AND STONINGTON HOLDINGS L.L.C.**

GREGORY P. JOSEPH LAW OFFICES LLC

/s/ Susan M. Davies

Gregory P. Joseph, N.Y. Atty Reg. # 1645852

Susan M. Davies, N.Y. Atty Reg. # 2413508

(sdavies@josephnyc.com)

Third Avenue, 31<sup>st</sup> Floor

New York, NY 10022

Telephone: (212) 407-1200

KOTIN, CRABTREE & STRONG

Amy C. Mainelli, BBO # 657201

One Bowdoin Square

Boston, MA 02114

Telephone: (617) 227-7031

**COUNSEL TO PLAINTIFFS GARY B. FILLER and LAWRENCE PERLMAN,  
Trustees of the TRA Rights Trust**

PARTRIDGE, ANKNER & HORSTMAN LLP

/s/ Terence K. Ankner

Terence K. Ankner, BBO #552469

200 Berkeley Street, 16th Floor

Boston, Massachusetts 02116

Telephone: (617) 859-9999

BOIES SCHILLER & FLEXNER

Karen C. Dyer

George R. Coe

255 South Orange Avenue, Suite 905

Orlando, Florida 32801

Telephone: (407) 425-7118

REED SMITH LLP

Alan K. Cotler

Joan A. Yue

Steven T. Voigt

2500 One Liberty Place 1650 Market Street

Philadelphia, PA 10103

Telephone: (215) 851-8100

**COUNSEL FOR JANET BAKER, JAMES BAKER, JKBAKER LLC AND  
JMBAKER LLC**